

LOWENSTEIN SANDLER LLP

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*Bankruptcy Counsel to the Proposed Securities
Class Action Lead Plaintiff Cameron Wyatt*

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

BlockFi Inc., *et al.*¹

Debtors.

Chapter 11

Case No. 22-19361 (MBK)

Jointly Administered

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned counsel hereby appear, pursuant to Section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), in the chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors-in-possession (collectively, the “Debtors”) for and on behalf of Cameron Wyatt (the “Proposed Lead Plaintiff”) in his individual capacity and as proposed lead plaintiff in the securities class action proceedings pending in the United States District Court for the District of Massachusetts under the caption, *Antonie Elas, individually and on behalf of all others similarly situated v. Zac Prince, Flori Marquez, Amit*

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors’ service address is 100 Horizon Center Blvd., 1st and 2nd Floors, Hamilton, NJ 08691.

Cheela, David Olsson, and Samia Bayou, Case No. 23-10472, and in the United States District Court for the District of New Jersey under the caption, *Trey Greene, individually and on behalf of all others similarly situated v. Zac Prince, Flori Marquez, Tony Laura, Jennifer Hill, and Gemini Trading, LLC*, Case No. 23-01165 (collectively, the “Securities Class Action Proceedings”).

PLEASE TAKE FURTHER NOTICE that the undersigned counsel, on behalf of the Proposed Lead Plaintiff and the proposed class the Proposed Lead Plaintiff seeks to represent in the Securities Class Action Proceedings (the “Class”), hereby requests service of any and all notices given or required to be given in the Chapter 11 Cases, and all papers served or required to be served in the Chapter 11 Cases, including all adversary proceedings and other related cases and proceedings (collectively, “Related Proceedings”), and requests that the names and addresses of the undersigned counsel be added to all mailing matrices and service lists maintained in the Chapter 11 Cases. Service may be made and directed as follows:

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PLEASE TAKE FURTHER NOTICE that this request for service includes not only the notices and papers referred to in the Bankruptcy Code, the Bankruptcy Rules, and the Federal Rules of Civil Procedure (wherever applicable), but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, telecopier, email, or electronic filing or otherwise filed or made with regard to the Chapter 11 Cases or any Related Proceedings, and for the purposes of CM/ECF.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit made or filed by the Proposed Lead Plaintiff, either individually or on behalf of the Class or any member thereof, does not, shall not, and shall not be deemed to:

- constitute a submission by the Proposed Lead Plaintiff, either individually or on behalf of the Class or any member thereof, to the jurisdiction of the Bankruptcy Court;
- constitute consent by the Proposed Lead Plaintiff, either individually or on behalf of the Class or any member thereof, to entry by the Bankruptcy Court of any final order in any non-core proceeding, **which consent is hereby withheld unless, and solely to the extent, expressly granted in the future with respect to a specific proceeding;**
- waive any substantive or procedural rights of the Proposed Lead Plaintiff or the Class or any member thereof, including but not limited to (a) the right to challenge the constitutional authority of the Bankruptcy Court to enter a final order or judgment on any matter; (b) the right to have final orders in non-core matters entered only after de novo review by a United States District Court judge; (c) the right to trial by jury in any proceedings so triable herein, in any Related Proceedings, in the Securities Class Action Proceedings, or in any other case, controversy, or proceeding related to or arising from the Debtors, the Chapter 11 Cases, any Related Proceedings, or the Securities Class Action Proceedings; (d) the right to seek withdrawal of the bankruptcy reference by a United States District Court in any matter subject to mandatory or discretionary withdrawal; or (e) all other rights, claims, actions, arguments, counterarguments, defenses, setoffs, or recoupments to which the Proposed Lead Plaintiff or the Class or any member thereof are or may be entitled under agreements, at law, in equity, or

otherwise, all of which rights, claims, actions, arguments, counterarguments, defenses, setoffs, and recoupments are expressly reserved, nor shall this request for notice be deemed to constitute consent to electronic service of any pleading or papers for which mailed or personal service is required under any applicable law, rule, regulation, or order.

Dated: August 14, 2023

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